

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

AUDIENCE OF ONE PRODUCTIONS, LLC,

*Plaintiff,*

v.

Case No. 3:16-cv-00795-HEH

IMPACT VENTURES, LLC f/k/a  
TNA ENTERTAINMENT, LLC *et al.*,

*Defendants.*

**DECLARATION OF STANLEY A. ROBERTS IN SUPPORT OF  
PLAINTIFF'S MEMORANDUM IN OPPOSITION TO THE MOTION TO  
DISMISS FOR LACK OF PERSONAL JURISDICTION FILED BY DEFENDANTS  
RONALD DEAN HARRIS AND AROLUXE, LLC D/B/A AROLUXE MARKETING**

I, Stanley A. Roberts, declare the following under penalty of perjury, this the 14th day of December, 2016:

1. I am an attorney at the law firm of McGuireWoods LLP, counsel for Plaintiff Audience of One Productions, LLC ("AO1"). I submit this Declaration in connection with AO1's Opposition to the Motion to Dismiss for Lack of Personal Jurisdiction filed by Defendants Ronald Dean Harris and Aroluxe, LLC d/b/a Aroluxe Marketing.

2. Attached as **Exhibit 1** is a true and correct copy of an email from T. Morin to M. Ball and P. Hannan (Oct. 12, 2015, 4:53 PM).

3. Attached as **Exhibit 2** is a true and correct copy of a 1.25.2016 Screenshot of Aroluxe's website, as archived by <https://web.archive.org>.

4. Attached as **Exhibit 3** is a true and correct copy of Sean Rueter, *Ron & Don Harris are reportedly TNA's investors and potential buyers*, <http://www.cagesideseats.com/tna-impact/2016/4/18/11453690/ron-don-harris-are-reportedly-tnas-investors-and-potential-buyers>

(Apr. 18, 2016, 3:29 PM). This article reprints, with credit to “Aroluxe.com,” the photos of Ron and Don Harris that appeared on Aroluxe’s website on the day the Complaint was filed.

5. Attached as **Exhibit 4** is a true and correct copy of the posting of bjpickering to “TNA To Be Bought By the Harris Twins,” [http://sportsandwrestling.mywowbb.com/view\\_topic.php?id=38936&forum\\_id=1&jump\\_to=581974](http://sportsandwrestling.mywowbb.com/view_topic.php?id=38936&forum_id=1&jump_to=581974) (Apr. 19, 2016, 1:45 AM).

6. Attached as **Exhibit 5** is a true and correct copy of Eric Lynch, *Report: Aroluxe Marketing Now Owns “TNA,” Dixie Still In Charge*, <http://www.sescoops.com/report-aroluxe-marketing-now-owns-tna/> (June 11, 2016).

7. Attached as **Exhibit 6** is a true and correct copy of an email from R. Harris to T. Morin (Dec. 14, 2015 8:12 PM).

8. Attached as **Exhibit 7** is a true and correct copy of Nick Paglino, *Dixie Carter Announces Longtime TNA Employees Left the Company, Announces The Signing of the Harris Brothers*, <http://www.wrestlezone.com/news/577817-dixie-carter-announces-longtime-tna-employee-has-left-the-company-announces-the-signing-of-the-harris-brothers> (May 8, 2015).

9. Attached as **Exhibit 8** is a true and correct copy of a U.C.C. Financing Statement, filed with the Delaware Department of State on March 14, 2016, with initial filing number 2016 1521515.

10. Attached as **Exhibit 9** is a true and correct copy of an email from R. Harris to T. Morin, D. Harris, K. Mitchell, and D. Sahadi (Aug. 31, 2015, 10:19 AM).

11. Attached as **Exhibit 10** is a true and correct copy of an email from R. Harris to T. Morin, D. Harris, K. Mitchell, and D. Sahadi (Aug. 31, 2015, 10:29 AM).

12. Attached as **Exhibit 11** is a true and correct copy of an email from R. Harris to M. Ball, T. Morin, and B. Ryder (Sept. 1, 2015, 9:12 AM).


13. Attached as **Exhibit 12** is a true and correct copy of an email from R. Harris to D. Broadhead (Sept. 29, 2015, 12:14 PM).

14. Attached as **Exhibit 13** is a true and correct copy of an email from R. Harris to T. Morin (Dec. 11, 2015, 3:54 PM).

15. Attached as **Exhibit 14** is a true and correct copy of an email from R. Harris to T. Morin, D. Harris, and D. Broadhead (Dec. 14, 2015, 6:52 PM).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14<sup>th</sup> day of December, 2016



Stanley A. Roberts (VSB No. 85111)

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**CERTIFICATE OF SERVICE**

I certify that on this 14<sup>th</sup> day of December, 2016, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/ Stanley A. Roberts  
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